## CONDENSED TRANSCRIPT

Deposition of: Ronald M. Gonda

September 10, 2003

Ronald M. Gonda vs. Metropolitan Life Insurance Company, et al.



Court Reporting & Video Services

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SEP 25 2003

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## Ronald M. Gonda v. Metropolitan Life Insurance Company, et al.

- 1-			
	Page 21		Page 23.
1	1 R. Gonda - by Ms. Lipman	R. Gonda -	by Ms. Lipman
1	<ol> <li>Q. Mr. Gonda, let me just use this</li> </ol>	A. No. It v	was supposed to be paid up
	3 binder, representing to you that Exhibits 1 and		50 bucks a month.
1	4 2 are the last two pages in here.		ou said before and correct
ı	5 Do you recall receiving this binder	me if I'm wrong	g, do you know what the term
:	6 from Mr. Friedt during the meeting at your	dividend means	o you know what me term
	7 house?		nat does it mean?
İ	8 A. Yeah. In the second meeting, I	~101 111	cing you if you know.
	9 think.		t of like get money back if
	10 Q. It was at the meeting?	you pay too mu	ch or something. Interest.
1:	11 A. Second one.	, , ,	ok that it's something.
	12 Q. The second one. Did you receive	with interest?	ak that it's something to do
	anything at the first meeting?	A. I think.	<i>i</i>
	14 A. No. We just talked.		
	15 Q. What did you talk about?	·	know what cash value means?
	16 A. He said about the policy being paid		n you sell something for the
	17 up inside of ten years.		
	18 Q. Did you discuss how it would be paid.		understand the term cash
	19 up in ten years?	Value in connect  A. That's h	ion with life insurance?
	20 A. Like 50 bucks a month.		ow much you sell it for when
	Q. So you discussed that if you paid		ucy.
	premiums of \$50 a month, the policy would be	Q Now, yo two meetings wi	u said before that you had
	paid up after ten years?	the first meetings wi	th Mr. Friedt. Concentrating on
	24 A. Yeah.		, did you discuss your present
	Q. Did you discuss with Mr. Friedt how		h.him?
	Q. Day you discuss what Mr. 1316ut now	A. Yes.	:
ı	n		
1	Page 22 R. Gonda - by Ms. Lipman	R. Gonda -	Page 24
	2 premiums would be paid after ten years?	O. What did	by Ms. Lipman
	3 A. Policy would be done after ten	policy?	l you tell him about that
	4 years; paid up. It was like a retirement		
	5 thing. The policy, it was like he sold it back		ne it wasn't a very good
,		notion It was as	
	6 so I got \$1800 out of it. He said the policy	policy. It was so	of Shaky because it was
	6 so I got \$1800 out of it. He said the policy 7 is paid up for three years and I only have	like stock and bo	nds. He said this policy was
	7 is paid up for three years, and I only have	like stock and bo better (indicating	nds. He said this policy was
	is paid up for three years, and I only have seven years to go and it will be paid up.	like stock and bo better (indicating Q: He said t	nds. He said this policy was (). hat the Pruco policy was
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1 R. Gonda - by Ms. Lipman 2 that sound to you like it would be paid up in ten years? 4 A. It's part of my age when I want to rotire. 62. It was a retirement thing. 6 Q. The policy was? 7 A. Yes. 9 Q. To provide some sort of income to 11 you when you retired? 10 Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money available to you when you retired; is that right? 10 A. Yes. 11 A. Yes. 12 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the S64,667, is the amount that you which is the S64,667, is the amount that front page of the policy, which is the S64,667, is the amount that front page of the policy, which is the S64,667, is the amount that front page of the policy, which is the first column, shows 1801. It goes from year one through year 20. Then on the next page, it continues through year 20. Then on the next page, it continues through year 20. 11 A. Yes. 12 A. Yes. 13 A. Yes. 14 C. Did you have any understanding of what that column meant? 15 A. Yes. 16 Did you have any understanding of what that column meant? 17 E. third in A. Yes. 18 A. Yes. 19 A. Yes. 20 Q. Would it be fair for me to say that the top it says, "Gross interest rates? 19 A. Yes. 20 Q. Would it be fair for me to say that the tender of the policy, which is the S64,667, is the amount that you then you retired; is that tooking at the document that you thought would be available to you at the took in the front page of the policy, which is the S64,667, is the amount of the front page of the policy, which is the first column, shows 1801. It goes from year one through year 20. Then on the next page, it continues that you that this document was the basis of your and the you and what you only had to pay for the policy, and you when you retired?  15 R. Gonda - by Ms. Lipman (Altorney/client discussion off required the your your cash surred the cleck, did you have any other discussions with anyone at Me				
that sound to you like it would be paid up in ten years?  A. It's part of my age when I want to retire. 62. It was a retirement thing. Q. The policy was? A. Yes. Q. That's why you bought it? A. Yes. Q. To provide some sort of income to you when you retired? A. Yes. Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a cortain amount of money available to you when you retired; is that right? A. Yes. Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement? A. Yes. Q. Let's go back to this document, asks you a question. A. Yes. Q. Let's go back to this document, that saks you a question. A. Yes. Q. Let's go back to this document, that that Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says are payment, \$1801. It goes from year one through year 20. Then on the not tyage, on the year 28. Did you have any understanding of what that column meant? A. No. I'm not sure. Q. The third page of Exhibit 1, sort of at the top it says, "Gross interest rate required on a hypothetical." Did you discuss with Mr. Friedt that maybe this document was a hypothetical? The most sure. Lofor't know. Q. Did you discuss with Mr. Friedt that maybe this document was a hypothetical? A. Yes.  R. Gonda - by Ms. Lipman (Attorney/Cient discussion off record. MS. RRNSIBERGER: Wait until she asks you a question. Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from year one through year 20. Then on the cortain amount of money that the year 28. Did you discuss sinding in the year 28. Did you discuss sind the year 28. Did you discuss sinterest rate required on a hypothetical." Did you discuss with Mr. Friedt; the two the friedt reduced to interest rates? R. Go		Page 57		Page 59
that sound to you like it would be paid up in ten years?  A. A. It's part of my age when I want to retire. 62. It was a retirement thing.  Q. The police was?  A. Yes.  Q. That's why you bought it?  A. Yes.  Q. To provide some sort of income to you when you retired?  A. Yes.  Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a mouth for ten years and then you would have a certain amount of money available to you when you retired; is that right?  A. Yes.  Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement?  A. Yes.  A.		R. Gonda - by Ms. Lipman	1	
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4 A. It's part of my age when I want to relieve to retire. 62. It was a retirement thing. 6 Q. The policy was? 7 A. Yes. 8 Q. That's why you bought it? 9 A. Yes. 10 Q. To provide some sort of income to you when you retired? 11 A. Yes. 12 A. Yes. 13 Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a mouth for ten years and then you would have a certain amount of money available to you when you retired; is that right? 18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy, which is the \$64,667; is the amount at the front page of the policy.  18 A. Yes.  19 A. Yes.  10 Q. Would it be fair for me to say that the amount at the front page of the policy.  21 R. Gonda - by Ms. Lipman (Atomeyiclient discussion off record.  22 In a R. Gonda - by Ms. Lipman (Atomeyiclient discussion off record.  23 R. Gonda - by Ms. Lipman (Atomeyiclient discussion with Mr. Friedt that Looking at the document that's been marked Exhib	3	ten years?	3	from year one through year 20. Then on the
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6 Q. The policy was? 7 A. Yes. 8 Q. That's why you bought it? 9 A. Yes. 10 Q. To provide some sort of income to you when you retired? 11 you when you retired? 12 A. Yes. 13 Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a mouth for ten years and then you would have a certain amount of money available to you when you retired; is that right? 18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667; is the amount that you fought would be available to you at retirement? 21 retirement? 22 A. Yes. 21 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 21 R. Gonda - by Ms. Lipman (Automeyiclient discussion off asks you a question. 22 Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that Looking at the document that's been marked Exhibit 2. Take a look at that Looking at the document that's been marked Exhibit 2. The formation of the saks you a question. 21 Do you see that? 22 Do you withink that this document was the basis of your understanding that you only had to pay for ten years? 23 A. Yes. 24 A. No. 25 Condent than what - you can put that 26 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 27 A. Yes. 28 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 39 The properties of the policy of the amount at the front page of the policy. 40 A. Yes. 41 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 41 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 42 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 43 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 44 A. Yes. 45 R. Gonda - by Ms. Lipman (Automeyiclient discussion off record. 46 R. Gonda - by Ms. Lipman (Automeyiclient discu	5		5	
A. Yes.  Q. That's why you bought it?  A. Yes.  Q. To provide some sort of income to you when you retired?  A. Yes.  Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money. The provide is the part of the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount that you thought would be available to you at retirement?  A. Yes.  R. Gonda - by Ms. Lipman (Automey/client discussion off record.  MS. ERNSBERGER: Wait until she asks you a question.  MS. ERNSBERGER: Wait until she asks you a question.  MS. ERNSBERGER: Wait until she asks you a question.  MS. ERNSBERGER: Wait until she asks you a question.  A. Yes.  Q. Did you discuss anything with Mr. Friedt that maybe this document was the word "hypothetical" with you?  A. I'm not sue.  Q. The thirdy page of Exhibit 1, sort of at the top it says, "Gross interest rates?  A. No.  Q. Did you discuss with Mr. Friedt that maybe this document was the word "hypothetical" with you?  A. I'm not sue.  Q. Did you discuss anything with Mr. Friedt required on a hypothetical."  A. No.  Q. Did you discuss with Mr. Friedt that maybe this document was the word "hypothetical" with you?  A. I'm not sue.  Q. Did you discuss anything with Mr.  Friedt related to interest rates?  A. No.  Q. Did he ever use the word "hypothetical" with you?  A. I'm not sue.  Q. Did you discuss with Mr. Friedt that maybe this document was the word wing the proving the pr				
8 Q. That's why you bought it? 9 A. Yes. 10 Q. To provide some sort of income to you when you retired? 11 A. Yes. 12 A. Yes. 13 Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money. 16 available to you when you retired; is that right? 18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at the front page of the policy, which is the \$54.667, is the amount at you are though you decide to institute this lawsuit or file this lawsuit?  A. No.  10 Do you think that this document was the basis of your understanding that you only had to p		- · · · · · · · · · · · · · · · · · · ·		
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10 Q. To provide some sort of income to you when you retired? 11 you when you retired? 12 A. Yes. 13 Q. In addition to that, your 14 understanding of the policy was that you only 15 had to pay \$50 a month for ten years and then you would have a certain amount of money. 16 available to you when you retired; is that right? 18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement? 21 retirement? 22 A. Yes. 23 R. Gonda - by Ms. Lipman (Attorney/client discussion off record. 24 retirement? 25 A. Yes. 26 Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from year one through year ten. 10 Do you see that? 11 A. Yes. 12 Q. Do you think that this document was the basis of your understanding that you only had to pay for ten years? 13 A. Yes. 14 Q. Do you know what the \$1801 figure is? 15 A. No. I on't think so. 16 Q. Do you recall discussing any of the other columns on this page with Mr. Friedt? 18 R. Gonda - by Ms. Lipman (Attorney/client discussion off record. 19 R. Gonda - by Ms. Lipman (Autorney/client discussion with say one restings, and your meeting with a gentleman who have any other discussions with anyone at Mellife regarding this policy? 19 A. Yes. 20 Do you see that? 21 Let's go back to this document, that says net payment, \$\$1801. It goes from payment, \$\$1801. It goes from 10 that says net payment, \$\$1801. It goes from 11 year one through year ten. 19 Q. Do you see that? 19 A. Yes. 20 Do you see that? 21 A. Yes. 22 Q. Do you see that? 23 A. Yes. 24 Q. Do you think that this document that the ten that is been marked Exhibit 2. Take a look at the took at t				
11 you when you retired? 12 A. Yes. 13 Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money available to you when you retired; is that right? 16 you would have a certain amount of money available to you when you retired; is that right? 17 available to you when you retired; is that right? 18 A. Yes. 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement? 21 A. Yes. 22 retirement? 23 A. Yes. 24 retirement? 25 A. Yes. 26 R. Gonda - by Ms. Lipman (Attorney/client discussion off record. 27 assy you a question. 28 Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that asys net payment, \$1801. It goes from year one through year ten. 29 Do you see that? 20 A. Yes. 21 A. Yes. 22 A. That's what he told me, ten years. 23 A. Yes. 24 Q. Do you think that this document was the basis of your understanding that you only had to pay for ten years? 25 A. That's what he told me, ten years. 26 Q. Do you treall discussing any of the other columns on this page with Mr. Friedt? 27 A. No. 28 Q. Do you recall discussing any of the other columns on this page with Mr. Friedt? 28 A. No. 29 Q. What about the document that's been marked as Exhibit 1? The net payment column, and the pix of the poil of the poil of the poil of the poil on a three trates?  20 A. Yes. 21 A. Yes. 22 A. Yes. 23 A. Yes. 24 C. Do you recall discussing any of the other columns on this page with Mr. Friedt? 25 A. No. 26 Q. Do you seel that? 27 A. No. 28 A. Yes. 29 C. Do you recall discussing any of the other columns on this page with Mr. Friedt? 29 A. No. 20 Do you sell discussing any				
A. Yes.  Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$46.67f, is the amount at the front page of the policy, which is the \$46.67f, is the amount at the front page of the policy, which is the \$46.67f, is the amount at the front page of the policy, which is the \$46.67f, is the amount that you will be available to you at retirement?  A. Yes.  R. Gonda - by Ms. Lipman (Attomey/client discussion off record.  MS. ERNSBERGER: Wait until she asks you a question.  MS. ERNSBERGER: Wait until she asks you a question.  A. Yes.  Q. Let's go back to this document, ask you a question.  A. Yes.  Q. Do you the ever use the word "hypothetical" with you?  A. Yes.  Q. Did he ever use the word "hypothetical" with you?  A. I'm not sure.  Q. The third page of Exhibit 1, sort of at the top it says, "Gross interest rates required on a hypothetical."  Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure.  Q. Did you discuss anything with Mr. Fried that be op interest rates?  A. I'm not sure.  Q. Did he ever use the word "hypothetical" with you?  A. I'm not sure.  A. I'm not sure.  Q. Did he ever use the word discussed with respect to your initial and counter down—other than what we have discusse			•	
Q. In addition to that, your understanding of the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money available to you when you retired; is that right?  A. Yes.  Q. Would is be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement?  A. Yes.  R. Gonda - by Ms. Lipman (Attorney/client discussion off easks you a question.  MS. RRNSBERGER: Wait until she asks you a question.  Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from year one through year ten.  Do you see that?  A. Yes.  13 A. Yes.  Q. Do you think that this document was the basis of your understanding that you only 16 had to pay for ten years?  A. No. Q. Do you know what the \$1801 figure is?  A. No. Q. Do you recall discussing any of the other columns on this page with Mr. Friedt? Priedt related to interest rates?  A. No. J don't mick so.  Q. Do you recall discussion off the policy, which is the \$64,667, is the amount that you the amount at the front page of the policy, which is the \$64,667, is the amount that you the amount at the front page of the policy, and the top it says, "Gross interest rate required on a thypothetical?"  Priedt related to interest rates?  A. No.  Q. Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure. I don't know.  Q. Did he ever use the word "hypothetical?" with you?  A. I don't think so. No.  R. Gonda - by Ms. Lipman document down - other than what we have discussed with respect to your initial telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman whe forught you your cash surrender check, did you have any discussions with anyone at MetLife regarding this policy?  A. No.  Q. Do you what the \$1801 figure is?  A. Yes.  Q. Do				
and the top and the policy was that you only had to pay \$50 a month for ten years and then you would have a certain amount of money 16 you would have a certain amount of money 17 available to you when you retired; is that 18 right?  A. Yes.  Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at 23 retirement?  A. Yes.  R. Gonda - by Ms. Lipman (Attorney/client discussion off record.  MS. ERNSBERGER: Wait until she asks you a question.  A. MS. Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked ass Exhibit 1, Who you know what the \$1801 figure is?  A. Yes.  Q. Do you think that this document was the basis of your understanding that you only had to pay for ten years?  A. That's what he told me, ten years.  Q. Do you necall discussing any of the other columns on this page with Mr. Friedt?  A. No. 1 don't think so. No.  Q. Do you still have a copy of the other columns on this page with Mr. Friedt? A. No. 1 don't think so. No.  A. No. 2 don't think so. No.  A. Yes.  A. I don't think so. No.  Q. Did he ever use the word "hypothetical" with you?  A. I don't think so. No.  Q. Did he ever use the word "hypothetical" with you?  A. I don't think so. No.  Q. Other than what — you can put that telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman who recuired, and the prought you your cash surrender check, did you have any other discussions with anyone at Met.life regarding this policy?  A. Yes.  Q. Do you think that this document was the basis of your understanding that you only that the basis of your understanding that you only had to pay for ten years?  A. That's what the told me, ten years.  Q. Do you know what the \$1801 figure is?  A. No. 1 don't think so.  Q. Do you think that this document was the basis of your understanding that you only the discussions with anyone regarding this policy?  A. No.  Q. What did you decide to interest r				
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16 you would have a certain amount of money available to you when you retired; is that 18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that 21 the amount at the front page of the policy, 22 which is the \$64,667, is the amount that you thought would be available to you at 23 retirement? 24 retirement? 25 A. Yes. 26 R. Gonda - by Ms. Lipman (Attorney/client discussion off 24 MS. RRNSBERGER: Wait until she 25 asks you a question. 27 A. Let's go back to this document, 26 Exhibit 1. And Exhibit 2. Take a look at 27 that. Looking at the document that's been 28 marked Exhibit 2. Mr. Gonda, there is a column that says net payment, \$1801. It goes from 19 had to pay for ten years? 28 A. Yes. 29 Did you discuss anything with Mr. Friedt that maybe this document was a hypothetical? 4 A. In That's what he told me, ten years. 19 O. Do you think that this document was 19 hop to see that? 4 A. Yes. 4 Conda - by Ms. Lipman 12 Conda there is a column that says net payment, \$1801. It goes from 19 had to pay for ten years? 4 A. Yes. 4 Do you see that? 5 A. No. 10 don't kink so. No. 20 Did he ever use the word "hypothetical" with you? 4 A. Gonda - by Ms. Lipman 12 Conda there where the word "hypothetical" with you? 4 A. Gonda - by Ms. Lipman 12 Conda there where have discussed with respect to your initial telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman who have any other discussions with anyone at MetLifer regarding this policy? 5 A. No. Q. Did you have any discussions with anyone regarding this policy? 6 A. No. Q. Do you think that this document was 18 he basis of your understanding that you only have any other discussions with anyone regarding this policy? 7 A. No. Q. Did you decide to institute this lawsuit? 8 A. Ro. J don't think so. 20 Conda decide to institute this lawsuit or file this lawsuit? 9 A. That's what he told me, ten years. 19 Conda decide to institute this lawsuit or file this lawsuit? 9 A. No. 10 Conda decide to institute this lawsuit or file this lawsuit? 9 A.				
available to you when you retired; is that right?  A. Yes.  Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement?  A. Yes.  R. Gonda - by Ms. Lipman (Attorney/client discussion off record.  MS. ERNSBERGER: Wait until she asks you a question.  Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from 11 year one through year ten.  Do you see that?  A. Yes.  A. No.  Q. Did you discuss with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure. I don't kinow.  Q. Did he ever use the word  "hypothetical" with you?  A. I don't think so. No.  Q. Other than what — you can put that telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman who have any other discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you discuss with Mr. Friedt that maybe this document was a hypothetical?  A. I'm not sure. I don't kinow.  Q. Did he ever use the word  "hypothetical" with you?  A. I'don't think so. No.  Q. Other than what — you can put that telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman who brought you your cash surrender check, did you have any other discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you have any discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you have any other discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you have any discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you have any discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. Did you have any discussions with anyone at Mef. Life regarding this policy?  A. No.  Q. When you point to Ms. Ernsberger, you mean the Behrend & Ernsberger firm?  A. N				
18 right? 19 A. Yes. 20 Q. Would it be fair for me to say that the amount at the front page of the policy, which is the \$64,667, is the amount that you thought would be available to you at retirement? 21 retirement? 22 retirement? 23 retirement? 24 A. Yes. 25 A. Yes. 26 Page 58 1 R. Gonda - by Ms. Lipman (Attomey/client discussion off record. 27 R. Gonda - by Ms. Lipman (Attomey/client discussion off record. 28 Ms. ERNSBERGER: Wait until she asks you a question. 29 Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from year one through year ten. 29 Do you see that? 30 A. Yes. 31 Q. Do you think that this document was the basis of your understanding that you only had to pay for ten years? 31 A. Yes. 32 Q. Do you know what the \$1801 figure is? 33 A. No. 34 Q. Do you recall discussing any of the other columns on this page with Mr. Friedt that maybe this document was a hypothetical? 4 A. I'm not sure. Idon't kinow. 4 Q. Did he ever use the word "hypothetical" with yon? 4 A. I don't think so. No. 4 C. Other than what — you can put that  Page 58 R. Gonda - by Ms. Lipman document down — other than what we have discussed with respect to your initial telepione conversation with Mr. Friedt that maybe this document was hypothetical? 4 A. Yes. 5 Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked by mail. 5 A. Yes. 6 Q. Do you see that? 7 A. No. 8 Q. Did he ever use the word "hypothetical" with yon? 8 A. I don't think so. No. 9 Other than what — you can put that  Page 60 R. Gonda - by Ms. Lipman document down — other than what we have discussed with respect to your initial telepione conversation with Mr. Friedt, the two maybe this document down — other than what we have discussed with respect to your initial telepione conversation with Mr. Friedt, have offer the word "hypothetical" with you your cash sur				Friedt related to interest extend
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24 retirement? 25 A. Yes:  Page 58  R. Gonda - by Ms. Lipman (Attorney/client discussion off record.  MS. ERNSBERGER: Wait until she asks you a question.  Q. Let's go back to this document, Exhibit 1. And Exhibit 2. Take a look at that. Looking at the document that's been marked Exhibit 2, Mr. Gonda, there is a column that says net payment, \$1801. It goes from year one through year ten.  Do you see that?  A. Yes.  Q. Do you think that this document was the basis of your understanding that you only had to pay for ten years?  A. That's what he told me, ten years.  Q. Do you know what the \$1801 figure is?  A. No.  Q. What about the document that's been marked as Exhibit 1? The net payment column,  A. I received a letter and they told me to call them.  Page 58  R. Gonda - by Ms. Lipman  R. Gonda - by Ms. Lipman document document down other than what we have discussed with respect to your initial telephone conversation with Mr. Friedt, the two meetings, and your meeting with a gentleman who brought you your cash surrender check, did you have any other discussions with anyone at  MetLife regarding this policy?  A. No.  Q. Did you have any discussions with anyone regarding this policy?  A. No.  Q. Why did you decide to institute this lawsuit?  A. I was contacted by mail.  Q. By whom?  A. Yes.  Q. When you point to Ms. Ernsberger, you mean the Behrend & Ernsberger firm?  A. Yes.  Q. What about the document that's been marked as Exhibit 1? The net payment column,				"hungthetical" with you?
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the basis of your understanding that you only had to pay for ten years?  A. That's what he told me, ten years.  Q. Do you know what the \$1801 figure is?  A. No. Q. Do you recall discussing any of the other columns on this page with Mr. Friedt? A. No. I don't think so. Q. What about the document that's been marked as Exhibit 1? The net payment column,  15 A. I was contacted by mail. Q. By whom? A. (Pointing.) Q. When you point to Ms. Ernsberger, you mean the Behrend & Ernsberger firm? A. Yes. Q. What did you receive from them in the mail? A. I received a letter and they told me to call them. Q. Do you still have a copy of the		Q. Do you think that this document was		
16 had to pay for ten years? 17 A. That's what he told me, ten years. 18 Q. Do you know what the \$1801 figure 19 is? 20 A. No. 21 Q. Do you recall discussing any of the 22 other columns on this page with Mr. Friedt? 23 A. No. I don't think so. 24 Q. What about the document that's been 25 marked as Exhibit 1? The net payment column,  16 Q. By whom? 17 A. (Pointing.) 18 Q. When you point to Ms. Ernsberger, 19 you mean the Behrend & Ernsberger firm? 20 A. Yes. 21 Q. What did you receive from them in 22 the mail? 23 A. I received a letter and they told me 24 to call them. 25 Do you still have a copy of the			15	·
17 A. That's what he told me, ten years. 18 Q. Do you know what the \$1801 figure 19 is? 20 A. No. 21 Q. Do you recall discussing any of the 22 other columns on this page with Mr. Friedt? 23 A. No. I don't think so. 24 Q. What about the document that's been 25 marked as Exhibit 1? The net payment column,  17 A. (Pointing.) 18 Q. When you point to Ms. Ernsberger, 19 you mean the Behrend & Ernsberger firm? 20 A. Yes. 21 Q. What did you receive from them in 22 the mail? 23 A. I received a letter and they told me 24 to call them. 25 Do you still have a copy of the				
18 Q. Do you know what the \$1801 figure 19 is? 20 A. No. 21 Q. Do you recall discussing any of the 22 other columns on this page with Mr. Friedt? 23 A. No. I don't think so. 24 Q. What about the document that's been 25 marked as Exhibit 1? The net payment column, 20 When you point to Ms. Ernsberger, 19 you mean the Behrend & Ernsberger firm? 20 A. Yes. 21 Q. What did you receive from them in 22 the mail? 23 A. I received a letter and they told me 24 to call them. 25 Q. Do you still have a copy of the			,	
19 is? 20 A. No. 21 Q. Do you recall discussing any of the 22 other columns on this page with Mr. Friedt? 23 A. No. I don't think so. 24 Q. What about the document that's been 25 marked as Exhibit 1? The net payment column, 20 A. Yes. 21 Q. What did you receive from them in 22 the mail? 23 A. I received a letter and they told me 24 to call them. 25 Q. Do you still have a copy of the		Q. Do you know what the \$1801 figure		
20 A. No. 21 Q. Do you recall discussing any of the 22 other columns on this page with Mr. Friedt? 23 A. No. I don't think so. 24 Q. What about the document that's been 25 marked as Exhibit 1? The net payment column, 20 A. Yes. 21 Q. What did you receive from them in 22 the mail? 23 A. I received a letter and they told me 24 to call them. 25 Q. Do you still have a copy of the		is?		
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	22 23 24	A. No. I don't think so.		A. I received a letter and they told me to call them.
	22 23 24	<ul><li>A. No. I don't think so.</li><li>Q. What about the document that's been</li></ul>	24	to call them.